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11 *Attorneys for Defendant, Hartford Fire Insurance Company*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 SALVADOR PLASCENCIA, individually; and
15 KYLE HAIL, individually,

16 Plaintiffs,

17 vs.

18 HARTFORD FIRE INSURANCE COMPANY,
19 a Connecticut Corporation; DOES, I through X,
20 inclusive; ROE BUSINESS ENTITIES, I
21 through X, inclusive,

22 Defendants.

Case No.: 2:22-cv-01420-GMN-MDC

**DISCOVERY PLAN AND
SCHEDULING ORDER**

23 Salvador Plascencia and Kyle Hail (**Plaintiffs**), and Defendant, Hartford Fire Insurance
24 Company (**Hartford**), (collectively, the **Parties**), by and through their counsel of record, hereby
25 submit this Stipulated Discovery Plan and Scheduling Order pursuant to the Court's Order. ECF
26 30.

27 **A. Statement Specifying the Discovery Completed:**

28 The Parties conducted the Fed. R. Civ. P. 26(f) conference on November 3, 2022. On
November 16, 2022, the Court entered its initial Discovery Plan and Scheduling Order [ECF No.
15].

To date, the Parties have completed the following discovery:

- Plaintiffs' Initial Disclosures were served on November 30, 2022;

- Hartford's Initial Disclosures were served on December 5, 2022;
- Plaintiffs' First Supplemental Disclosures were served on January 27, 2023;
- Kyle Hail's Interrogatories to Hartford were served on February 8, 2023;
- Salvador Plascencia's Interrogatories to Hartford were served on February 8, 2023;
- Plaintiffs' Requests for Production to Hartford were served on February 8, 2023;
- Hartford's Interrogatories to Salvador Plascencia were served on March 13, 2023;
- Hartford's Interrogatories to Kyle Hail were served on March 13, 2023;
- Hartford's Requests for Production of Documents to Kyle Hail were served on March 13, 2023;
- Hartford's Requests for Production of Documents to Salvador Plascencia were served on March 13, 2023;
- Hartford's Requests for Admissions to Kyle Hail were served on March 13, 2023;
- Hartford's Requests for Admissions to Salvador Plascencia were served on March 13, 2023;
- Hartford's First Supplemental Disclosures were served on April 17, 2023;
- Hartford's Responses to Plaintiffs' Requests for Production were served on April 17, 2023;
- Hartford's Responses to Kyle Hail's Interrogatories were served on April 17, 2023;
- Hartford's Responses to Salvador Plascencia's Interrogatories were served on April 17, 2023;
- Hartford subpoenaed records from Concentra on May 5, 2023;
- Hartford subpoenaed records from Desert Radiology on May 5, 2023;
- Hartford subpoenaed records from Desert Orthopaedic Center on May 5, 2023;
- Kyle Hail's Responses to Hartford's Requests for Production were served on May 10, 2023;
- Salvador Plascencia's Responses to Hartford's Interrogatories were served on May 10, 2023;

- Salvador Plascencia's Responses to Hartford's Requests for Admission were served on May 10, 2023;
- Kyle Hail's Responses to Hartford's Requests for Admission were served on May 10, 2023;
- Kyle Hail's Responses to Hartford's Interrogatories were served on May 10, 2023;
- Salvador Plascencia's Responses to Hartford's Requests for Production were served on May 10, 2023;
- Plaintiffs' Second Supplemental Disclosures were served on May 12, 2023
- Hartford's Second Supplemental Disclosures were served on June 28, 2023;
- Salvador Plascencia's Supplemental Responses to Hartford's Interrogatories were served on June 28, 2023;
- Hartford subpoenaed records from Southern Hills Hospital on June 29, 2023;
- Plaintiffs' Third Supplemental Disclosures were served on June 29, 2023;
- Hartford deposed Salvador Plascencia on June 30, 2023;
- Hartford subpoenaed records from Achieve Physical Therapy on June 30, 2023;
- Hartford's Third Supplemental Disclosures were served on July 12, 2023;
- Hartford deposed Kyle Hail on September 1, 2023;
- Hartford's Second Requests for Production of Documents to Kyle Hail were served on September 5, 2023;
- Hartford's Fourth Supplemental Disclosures were served on October 2, 2023;
- Plaintiffs' Initial Expert Disclosures were served on January 25, 2024;
- Hartford's Initial Expert Disclosures were served on January 25, 2024;
- Hartford's Third Set of Production of Documents were served upon Kyle Hail on February 13, 2024;
- Hartford's Rebuttal Expert Disclosures were served on February 28, 2024;
- Plaintiffs' Rebuttal Expert Disclosures were served on February 28, 2024;
- Kyle Hail's Responses to Hartford's Third Set of Production of Documents were served on March 14, 2024;

- Plaintiffs deposed Hartford employee Sarah Grossman on March 21, 2024;
- Plaintiffs' First Supplement to Initial Expert was served on March 27, 2024;
- Hartford's Fifth Supplemental Disclosure was served on March 27, 2024; and
- Hartford's Sixth Supplemental Disclosure was served on June 7, 2024.

B. Specific Description of the Discovery that Remains to be Completed:

The Parties need to conduct the following discovery:

- Deposition of Fed. R. Civ. P. 30(b)(6) Witness for Hartford;
- Deposition of various fact witnesses and experts; and
- Such other discovery that may be deemed necessary or appropriate.

C. A proposed schedule for completing all remaining discovery.

The Parties request that the current deadlines in the Scheduling Order [ECF No. 15] as amended by later Orders [ECF Nos. 20 and 24] be extended as follows:

1. Last Day to Amend Pleadings or Add Parties: currently July 3, 2023; **closed, no change;**
2. Last Day to Disclose Initial Expert Report: currently January 25, 2024; **closed, no change;**
3. Last Day to Disclose Rebuttal Experts: currently February 28, 2024; **closed, no change;**
4. Last Day to Complete Discovery: currently June 3, 2024; **desired December 30, 2024;**
5. Last Day to File Dispositive Motions: currently July 3, 2024, **desired January 30, 2025;**

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IT IS SO STIPULATED.

DATED this 14th day of June, 2024.

WRIGHT, FINLAY & ZAK, LLP

/s/ Stephanie A. Garabedian

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Dated this 18th day of June, 2024.

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